

DOCKET FILE COPY ORIGINAL

Dr. Frank Allen Philpot  
5207 King Charles Way  
Bethesda, MD 20814

May 24, 1993

RECEIVED

MAY 24 1993

Secretary  
Federal Communications Commission  
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

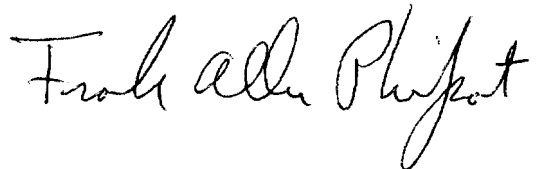
Re: Reply Comments  
MM Docket No. 93-48  
Children's Television  
Programming

Dear Madam Secretary,

Enclosed are an original and 14 copies of the REPLY COMMENTS OF DR. FRANK ALLEN PHILPOT to the Commission's Notice of Inquiry in regard to Children's Television Programming (MM Docket No. 93-48)

Kindly contact the undersigned if there is any question concerning the Enclosure.

Respectfully Submitted,



Frank Allen Philpot, Ph.D.

No. of Copies rec'd  
List A B C D E

0414

DOCKET FILE COPY ORIGINAL

RECEIVED

MAY 24 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Policies and Rules Concerning )  
Children's Television Programming )  
 )  
Revision of Programming Policies )  
For Television Broadcast Stations )

MM Docket No. 93-48

To the Commission:

Reply Comments  
of  
Frank Allen Philpot

1. I am filing reply comments in this matter because of considerable personal experience in children's programming and a feeling that a major point was not sufficiently addressed in the comments filed by parties in response to the Notice of Inquiry.

2. I have a Ph.D. in Communications Research from Stanford University and from 1974 to 1980 I served as Director of Children's Program Development for Kaiser Broadcasting (which later became Field Communications). This company operated six independent UHF television stations and broadcast a large amount of children's programming. In this position I developed educational programming for the company's stations. These programs were subsequently syndicated to other commercial television stations. Programs I supervised received numerous national awards.

3. From 1980 to 1982 I served as Director of Children's and Youth Programming for the Public Broadcasting Service where I managed the daytime children's programming schedule for PBS and developed family specials for the prime-time schedule.

4. My reply comments here deal with the emphasis the Commission and others have chosen to place on the use of standard-length programs to fulfill a licensee's obligations under the Children's Television Act.

5. The Commission's Notice of Inquiry in this matter said in part:

"...we believe that broadcasters should place their primary reliance in establishing compliance with the CTA on standard-length programming ... and should accord short-segment programming secondary importance in this regard."<sup>1</sup>

6. Many of the comments supported this position and echoed the Commission's position that standard-length programming is scheduled and therefore available to the child audience at predictable times. The Commission also noted, "This is especially important to parents who may be more directly involved in screening the television viewing of younger children."<sup>2</sup>

---

<sup>1</sup>Paragraph 8.

<sup>2</sup>Paragraph 8.

7. I believe that this approach suggests to broadcasters that ultimately only standard-length programming will serve to meet the standards set by the Commission to implement the Children's Television Act. This has two disadvantages:

- Licensees are denied the freedom to experiment with

children, there is no evidence that parents of most older children, i.e. 6-11, play a significant role in the selection of programs to view during the afternoon or weekend mornings when most viewing of "children's programming" occurs. (The situation is clearly different in prime time where children and adults may consult together in making viewing choices.)

10. During the periods traditionally accepted as children's viewing times (especially on independent stations), children make their own choices and, in a marketplace where the majority of children have more than 30 channels to choose from, very few will choose to watch an educational or instructional program.

11. Certainly I know from my own experience as a parent that my children ignore the currently available instructional and educational programs on public television in favor of the cartoons, sitcoms and action adventure programs on commercial television. Short segments are the only way to reach those children who do not consciously choose to watch educational programs.

12. Again, it is important to have some standard-length educational and informational programs available for the small minority of children who will voluntarily choose them, but the only effective way to reach most children is to include the

educational and informational material in short segments mixed into entertainment programs.

13. Although parents of younger children can steer their children towards regularly scheduled standard-length programs, older children -- who make their own choices -- can avoid them because they are regularly scheduled. Properly produced short segments, however, are seldom disruptive enough to prompt the child viewer to look for another entertainment choice.

14. These children are not in the classroom. They are using television for entertainment and to effectively reach them we must work within the entertainment framework of commercial television, not outside it. If we can use commercial breaks to

16. Independent television stations have long programmed to children with blocks of short cartoons which enabled children to tune in and out as they chose. Cable networks like MTV, VH-1 and the new Animation Channel have all broken the "regularly scheduled" paradigm.

17. It is also important to note that many licensees will be encouraged to produce material for children if short-form material is counted towards the requirements. Economics virtually preclude an individual station from producing a regularly scheduled half-hour program with sufficient production values to compete for a sizable audience. Likewise, only large studios or major syndicators have the resources to mount a half-hour series with high production values, but many small, independent producers can develop short-form material. If diversity of production sources is a goal of the Commission, allowing stations to count short-form programming will substantially further this goal.

18. In this case individual licensees could combine short segments which they had produced or had acquired from a variety of syndicators to produce a rich and diverse mix of educational material which children will actually watch.

19. Short segments also lend themselves to repetition -- an essential ingredient in learning some types of information. (It

is interesting to note in this regard, that one of the most successful children's television programs in history, "Sesame Street" is essentially a string of short program segments. Nothing on "Sesame Street" ever runs longer than 3 minutes!)

20. For those concerned about the administrative implementation of the new Commission rules, it should be noted that short segments are just as quantifiable as regularly scheduled standard length programs.

21. At Kaiser Broadcasting, between 1974 and 1980, we produced over 100 short program segments for children on a wide variety of topics. These segments were mixed into the stations' popular animated programs and reached a very large audience. This project -- called "Snippets" -- was widely praised and received an Action for Children's Television Award, an Ohio State Award and a George Foster Peabody Award.


22. This project was possible only because of the economies of production involved in short-form programming. Although the company also produced a number of standard-length children's programs -- both specials and series -- "Snippets" reached more children than all of our half-hour programs combined. It was also



23. In the 1970s ABC produced a series of animated segments for their Saturday morning schedule entitled "Grammar Rock" and "Schoolhouse Rock." This programming effectively taught children grammar and the multiplication tables in a pleasant and painless way.

24. In summary, the Commission should allow licensees to fulfill a substantial portion of their obligation to provide educational and informational children's programming with short-form material, providing they also provide some standard-length, regularly scheduled programming of this type. This would reach children -- who would otherwise avoid such programming -- with educational and instructional content and would attract a large and diverse group of producers to the children's programming arena. For these reasons, the Commission should not adopt rules which effectively preclude licensees from experimenting with the creative approaches I have described.

Respectfully submitted,

A handwritten signature in cursive script, reading "Frank Allen Philpot". The signature is written in dark ink and is positioned above the printed name.

Frank Allen Philpot, Ph.D.